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12 METROPOLITAN SECURITY SERVICES, INC.
13 doing business as WALDEN SECURITY
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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JAY VAN DYCK,

Plaintiff,

v.

WALDEN SECURITY and
METROPOLITAN SECURITY
SERVICES, INC., and DOES 1
THROUGH 100, INCLUSIVE,

Defendants.

Case No. 2:24-cv-03409-AC

**STIPULATION AND ORDER
FOR EXTENSION OF TIME FOR
DEFENDANT TO FILE
RESPONSIVE PLEADING
(L. Rule 144; FRCP 6)**

STIPULATION

Pursuant to Civil Local Rule 144, and Fed. R. Civ. P. 6, Jay Van Dyck (“Plaintiff”), by and through his attorneys of record, and Defendant Metropolitan Security Services, Inc. doing business as Walden Security (“Defendant”), by and through its attorneys of record, hereby stipulate to an extension as follows:

1. On October 3, 2024, Plaintiff filed a complaint (“the Complaint”) in Sacramento Superior Court (Case No. 24CV022062.)

2. On December 6, 2024, Defendant filed a Notice of Removal pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 in the Eastern District of California (Case No. 2:24-at-01548).

3. Defendant’s current deadline to file a responsive pleading is December 13, 2024.

4. On December 12, 2024, the counsel for the parties met and conferred regarding Defendant’s request for an extension to file a response to the Complaint. The request was made to give Defendant’s counsel additional time to investigate the allegations before filing a response. Plaintiff’s counsel agreed to the requested extension.

Pursuant to the foregoing, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, that Defendant’s date to respond to the Complaint is extended to January 10, 2025.

IT IS SO STIPULATED.

DATED: December 12, 2024

CHRISTOPHER H. WHELAN, INC.

By: /s/
CHRISTOPHER H. WHELAN
DANIA A. PESTANA
Attorneys for Plaintiff
JAY VAN DYCK

1 DATED: December 12, 2024

SAUL EWING LLP

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3 By: _____/s/

4 KENNETH M. JONES


JESSICA E. BRADLEY

5 Attorneys for Defendant

6 METROPOLITAN SECURITY SERVICES,
7 INC. doing business as WALDEN SECURITY

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9 IT IS SO ORDERED.

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11 DATED: December 13, 2024

12 
13 ALLISON CLAIRE
14 UNITED STATES MAGISTRATE JUDGE

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